



U.S. Department of Justice

United States Attorney  
Southern District of New York

**MEMO ENDORSED**

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

July 21, 2020

**By ECF**

The Honorable William H. Pauley III  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Shaquille Williams*, 20 CR 286 (WHP)**

Dear Judge Pauley,

The Government writes on behalf of the parties with respect to the defendant's letter dated June 10, 2020 seeking certain records relating to the selection of the grand jury that returned the indictment in this case. As the Court is aware, in *United States v. Balde*, 20 Cr. 281 (KPF), the Government has litigated a set of document requests that are substantially identical to those here and in response to which Judge Failla has now ordered the disclosure of certain jury records in possession of the Jury Administrator for the Southern District of New York, Linda Thomas. The parties are in agreement that the defendant is entitled to receive those same jury records, which the Government understands Ms. Thomas and her staff are preparing for disclosure. The parties anticipate that prior to their receipt of the jury records, the parties will propose to the Court a protective order to address specific issues tied to the jury records and that such protective order will be modeled upon one that the parties anticipate will be entered shortly in *Balde*. Finally, after the parties have received and reviewed the jury records, the defendant reserves the right, with the consent of the Government, to raise any perceived deficiencies in the response to his document requests in light of the information and records received from Ms. Thomas.

The Government also writes on behalf of the parties to respectfully request an adjournment of the conference currently scheduled for August 7, 2020 to a date and time in the week of September 14, 2020 or thereafter that is convenient to the Court. The parties request the adjournment in order to permit the parties to receive and review the jury records and other discovery in connection with this case and to afford the defendant additional time in which to consider any pre-trial motions in light of those materials. As at his arraignment, the defendant requests leave to approach the Court in the interim should the defendant identify any grounds on which to submit a renewed application for bail. Finally, with the consent of the defendant, the Government requests respectfully that the Court exclude time under the Speedy Trial Act from August 7, 2020 through the date of any adjournment pursuant to 18 U.S.C. § 3161(h)(7) on the basis that the interest of the public and the defendant in a speedy trial are outweighed here by the interests of the defendant in having the opportunity to review discovery provided to date and that is anticipated to become available shortly and to consider any possible pre-trial motions, an

exclusion that the Government further submits is appropriate at this time in light of the national emergency declared over the coronavirus pandemic.

Respectfully,

AUDREY STRAUSS  
Acting United States Attorney

By: Thomas John Wright  
Thomas John Wright  
Assistant United States Attorney  
(212) 637-2295

cc: Glenn Garber (Counsel for Defendant Shaquille Williams) (by ECF)

Application granted. Conference adjourned to  
September 16, 2020 at 9:00 a.m. Time excluded until September  
16, 2020 in the interests of justice.

SO ORDERED:

William H. Pauley III  
WILLIAM H. PAULEY III  
U.S.D.J.

July 22, 2020